

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 12-cr-20545

vs.

Hon. Bernard Friedman

MARK JOVETT APSEY (D-1)

MARTIN GRENIER (D-2)

MARK A. HOPKINS (D-3)

Defendants.

**STIPULATION TO EXTEND PLEA CUTOFF,
FINAL PRETRIAL CONFERENCE AND TRIAL**

NOW COME the above named parties, by and through their respective counsel and hereby stipulate to the enlargement of time within which to extend the date for the Plea Cutoff, Final Pretrial Conference and Trial in this matter for the following reasons:

1. The Defendants are charged in a First Superseding Indictment with multiple counts, including: Conspiracy to Launder Monetary Instruments in violation of 18 USC §1956(h), 1956(a)(I)(A)(i), 1956(a)(1)(B)(i)-(ii), 1956(a)(3), 1957; Cross-Border Money Laundering in violation of 18 USC §1956(a)(2)(A) and Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises, Aiding and Abetting in violation of 18 USC §1952(a)(1), 1952(a)(3), 2.

2. That the discovery in this file is voluminous and there are complex legal and factual issues to be reviewed in this matter and defense counsel need additional time to research and prepare for trial. Defense counsel have received two waves of discovery, each

of which contain several thousand pages of discovery.

3. That an extension of time will be required in order for defense counsel to prepare for trial.

4. That such an extension of time shall be excludable in computing the time within which the trial in this matter must commence, pursuant to the Speedy Trial Act, 18 USC §3161 (h)(1)(F), and (h)(3)(A), and that failure to grant a continuance would result in a miscarriage of justice.

5. The parties further agree to extend the dates for the Final Plea Cutoff, Pretrial Conference and Jury Trial for a period of ninety (90) days.

6. The ends of justice are served by taking this action and outweigh the best interest of the public and the defendants in a speedy trial. 18 USC §(h)(8)(A), (B).

WHEREFORE, for the reasons stated above, it is respectfully requested that the time within which to schedule a final plea cut off, a Final Pretrial Conference and Trial be extended for 90 days from the entry of the attached Order.

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Dated: January 2, 2014

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Dated: January 2, 2014

/s/ Julie A. Beck

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Dated: January 2, 2014

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Dated: January 2, 2014

/s/ Jonathan M. Epstein

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Dated: January 2, 2014

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 12-cr-20545

vs.

Hon. Bernard Friedman

MARK JOVETT APSEY (D-1)

MARTIN GRENIER (D-2)

MARK A. HOPKINS (D-3)

Defendants.

**ORDER EXTENDING PLEA CUTOFF,
FINAL PRETRIAL CONFERENCE AND TRIAL**

At a session of said Court, held in the Federal Building, Detroit,
Michigan on January 2, 2014

PRESENT: HON. BERNARD A. FRIEDMAN
U.S. DISTRICT COURT JUDGE

Upon the reading and filing of the above Stipulation, and the Court being fully
advised in the premises;

IT IS FURTHER ORDERED that the final plea cut off, the Final Pretrial Conference,
and Trial is hereby extended for a period of 90 days from the current dates which were
previously set by the Court.

IT IS FURTHER ORDERED that because there is voluminous discovery and complex
legal and factual issues to be reviewed in this matter and that additional research is required
by defense counsel to properly address these issues, the ends of justice are served by taking
this action and outweigh the interest of the public and the defendant to a speedy trial.

IT IS FURTHER ORDERED that the above described extension of time shall be excluded in computing the time within which trial in this matter must commence, pursuant to the Speedy Trial Act, 18 USC §3161 (h)(1)(F).

IT IS FURTHER ORDERED that the Plea Cutoff and Final Pretrial Conference shall be Tuesday, April 15, 2014 at 11:00 a.m. and Jury Trial shall be Tuesday, May 6, 2014 at 9:00 a.m..

S/ Bernard A. Friedman_____
U.S. DISTRICT COURT JUDGE

January 2, 2014